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November 13, 2007

BY HAND DELIVERY

Marlene H. Dortch Secretary Federal Communications Commission Room TW-B204 445 12th Street SW Washington, DC 20664

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Federal Communications Commission Office of the Secretary

Re:

ITC-214-20071016-00424

Dear Ms. Dortch:

I am enclosing an amendment to the above-referenced section 214 application. The amendment addresses the following:

1. In Item 1 of the 214 application, the name of the applicant is corrected to read Pacifictel International, Inc. instead of Pacifictel. S.A. Pacifictel. S.A., the name of the parent company of Pacifictel International, Inc., was inadvertently entered into the FRN registration system, instead of the name of the subsidiary. Tha parent company's name was then automatically picked up by the MY IBFS system in electronically filling out the application. However, to be clear, the correct name of the applicant is Pacifictel International, Inc. The EIN number associated with the FRN is (and has always been) the EIN of Pacifictel International, Inc. The name has now been corrected in the FCC's FRN registration records. This amendment to the above-referenced application corrects the name of the applicant to match the FCC's corrected FRN records and provides certain additional information as indicated below.

- 2. In Item 3 of the section 214 application, a checkmark is added to "Global or Limited Global Resale Authority (Section 63.18(e)(3))" to match the caption in Item 8.
- 3. In connection with Items 11 and 12, a new Attachment 1 is provided to address Pacifictel International, Inc. and a statement pursuant to section 63.18(m) that the Applicant agrees to be classified as dominant on the U.S.-Ecuador route without prejudice to a later showing that the Applicant should be classified as non-dominant on the route.
- 4. In connection with Item 14, a new Attachment 2 is provided to address Pacifictel International S.A.

Questions concerning this matter should be addressed to the undersigned.

Sincerely yours,

Solution

Joel S. Winnik

cc: Susan O'Connell, International Bureau (by e-mail)
Greg Pinto, U.S. Department of Homeland Security

Enclosures

Pacifictel International, Inc. Section 214 Application

ATTACHMENT 1

Question 11

§63.18(i) Pacifictel International, Inc. ("the Applicant") hereby certifies that it is affiliated with foreign carriers. The country in which it is affiliated with foreign carriers is Ecuador.

§63.18(j) See below.

§63.18(k) Ecuador is a member of the World Trade Organization.

§63.18(I) The Applicant will file the traffic reports required by §43.61(c) of the FCC regulations.

§63.18(m) The Applicant agrees to be classified as dominant on the U.S.-Ecuador route without prejudice to a later showing that the Applicant should be classified as non-dominant on the route.

Question 12

§63.18(j) The Applicant hereby certifies that it seeks to provide international telecommunications services to Ecuador, where the Applicant is affiliated with foreign carriers. The Applicant is 100% owned by Pacifictel S.A., which is a foreign carrier in Ecuador and, by virtue of common ownership of Pacifictel S.A. and Andinatel S.A. by Fondo de Solidaridad, with Andinatel S.A. Both Pacifictel S.A And Andinatel S.A. are on the International Bureau's list of companies presumed to possess market power.

Pacifictel International, Inc. Section 214 Application

ATTACHMENT 2

Question 14

The name, address, citizenship and principal business of the applicant's ten percent or greater direct and indirect shareholders or other equity holders, and any interlocking directorates with other telecommunications service companies are as follows:

Pacifictel S.A.: 100% of Pacifictel International, Inc.

Fondo de Solidaridad, an autonomous entity created under Article 250 of the

Ecuador Constitution: 100% of Pacifictel S.A. (and Andinatel S.A.)

Question 15

§63.18(d) The Applicant has not previously received authority under section 214 of the Communications Act of 1934.

§63.18(e)(3) Not applicable.

§63.18(g) Not applicable.